

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF
TAFFY JOHNSON

DECLARATION OF TAFFY JOHNSON

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, Taffy Johnson, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am the founder and Executive Director of the United Territories of Pacific
5 Islanders Alliance – Washington (UTOPIA WA). I am Samoan, Fa’afafine, and a Transgender
6 woman. UTOPIA WA was started in 2009 to provide a space for the Queer, Trans, and Pacific
7 Islander (QTPI) communities in the Puget Sound Region. Prior to starting UTOPIA WA, I
8 worked in social services for the state of Washington providing case management support. I also
9 have a background in community organizing and policy work. I have lived in Washington since
10 2006.

11 3. In my current role, I oversee UTOPIA's advocacy, policy, and community
12 organizing initiatives, with a focus on advancing gender-affirming care and promoting equity
13 for Queer and Trans Pacific Islanders (QTPIs) through systemic change. UTOPIA’s mission is
14 to actively replace systems of oppression with ecosystems of care and safety for all our
15 communities through Black and Brown organizing, prioritizing land and bodily autonomy, and
16 reclaiming our cultural narratives. We envision a world of abundance, autonomy, and harmony
17 where all forms of supremacy cease to exist for all life.

18 4. UTOPIA provides important services for 2SLGBTQIA+ youth, particularly
19 QTPIs in the Puget Sound Region. We are the only organization that provides services for queer
20 and trans youth in South King County specifically tailored for LGBTQIA+ Pacific Islanders.
21 Our Youth Program believes that every trans and gender diverse young person deserves to feel
22 safe, affirmed, and empowered in their schools. We provide peer support, one-on-one case
23 management, educational workshops, and training in schools. We collaborate with educators,
24 staff, and students to provide educational workshops and trainings in gender inclusivity, cultural
25 competency, and best practices to support trans students in their schools. We also work alongside
26

1 community coalitions to protect trans students, advocate for bathroom access, reducing bullying,
2 and respecting pronouns.

3 5. UTOPIA also offers a free community clinic, Mapua Maia Clinic, located in
4 South King County. The clinic provides wraparound services, including mental healthcare,
5 gender-affirming care, legal assistance, and referrals. All of our services are free. We have a paid
6 staff nurse as well as volunteer doctors and a volunteer therapist. We have seen an increased
7 amount of LGBTQ+ youth at our clinic with their parents and have been able to provide
8 professional guidance, information, and referrals. We provide gender-affirming care for adults
9 in our community. Our clinic is open to anyone in our community, not just QTPI individuals. In
10 2024, we served over 1,450 community members through all the various services and outreach
11 at our clinic.

12 6. Trans youth face substantial discrimination in the community and in various
13 aspects of their lives, often facing rejection from family, peers, and educational institutions. This
14 discrimination can manifest in bullying, harassment, and exclusion, leading to mental health
15 struggles, such as anxiety, depression, and feelings of isolation. Trans youth are more likely to
16 encounter barriers to accessing gender-affirming healthcare and support services, which can
17 further exacerbate their challenges. Additionally, they often lack representation in media,
18 schools, and public spaces, making it harder for them to find positive role models and affirming
19 environments. This compounded marginalization can deeply impact their well-being and mental
20 health, sense of identity, and future opportunities, underscoring the need for comprehensive
21 policies, support systems, and advocacy to ensure they have the resources and acceptance they
22 deserve.

23 7. I understand that the President of the United States has issued an Executive Order
24 restricting access to gender-affirming care, including for adults up to the age of 19. This
25 Executive Order is inhumane. This Order creates an unnecessary barrier, not only to safe school
26 environments, but also to mental health and overall well-being. Decades of research and

1 numerous peer-reviewed studies have shown that gender-affirming, non-invasive care—such as
2 puberty blockers, hormone therapy, and social transition—significantly improves mental health
3 outcomes for trans youth, reducing rates of depression, anxiety, and suicide. Additionally,
4 studies consistently demonstrate that regret rates for gender-affirming care are extremely low,
5 with less than 3% of individuals expressing regret—far lower than the rates associated with many
6 major surgeries and healthcare procedures. The urgent need to protect and uplift trans youth has
7 never been clearer, and we must resist policies that strip them of their right to healthcare, safety,
8 and dignity.

9 8. I fear that this Order will decrease access to health care, increase stigma,
10 misinformation and fear, and threaten the wellbeing and the mental health of countless youth
11 and young adults. I worry that losing access to gender-affirming care will exacerbate mental
12 health challenges. Our clinic will likely see a surge in demand for counseling and community
13 support. This will directly strain not only our resources, but the limited capacity to provide the
14 actually needed care and services to save and improve their lives. It may also limit our ability to
15 advocate for trans youth if we see resistance from government. This Order is going to destroy
16 trust in our LGBTQ+ and Pacific Islanders community, something we’ve worked hard to build
17 over the past fifteen years.

18 9. We’ve heard from a multitude of our community members that they are
19 concerned about the high risk of mental health issues, including depression and suicidal ideation,
20 for young people because of this Executive Order. Parents are fearful of the legal repercussions.
21 Our partners and providers are also concerned. We’ve discussed these concerns, but also their
22 commitment to continue to provide much needed care to our community. And while UTOPIA is
23 concerned about the legal repercussions of continuing to provide gender-affirming care, we
24 haven’t considered scaling back our work—it is too important to the community.
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1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this 5th day of February 2025, at Kent, Washington.

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5 TAFFY JOHNSON
6 Executive Director of the United Territories of
7 Pacific Islanders Alliance
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